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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 19, 2008

Name of company covered by this certification: Shentel Converged Services

Form 499 Filer ID: 825891

Name of signatory: David E. Ferguson

Title of signatory: Vice-President Customer Service


I, David E. Ferguson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

  
2/29/08

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LOCAL AND LONG DISTANCE TELEPHONE • INTERNET AND DATA SERVICES • CABLE TELEVISION  
WIRELESS VOICE AND DATA SERVICES • ALARM MONITORING • TELECOMMUNICATIONS EQUIPMENT

**SHENANDOAH TELECOMMUNICATIONS**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

Below is the statement to explain how Shenandoah Telecommunications Operating Procedures ensure compliance with 47 CFR 64.2001-2009:

- a. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
- b. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with David Ferguson, Vice-President Customer Service or Christina Price, the Company's Customer Service Business Analyst. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
- c. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
- d. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with David Ferguson or Christina Price regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, consultation is made with one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either David Ferguson or Christina Price regarding any proposed use of CPNI.
- e. Further, both David Ferguson or Christina Price personally oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. David Ferguson also reviews all notices required by the FCC regulations for compliance therewith.
- f. David Ferguson and Christina Price ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
- g. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.